

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

In re: Burkhart, Toby)
) Case No.: 16-80293
Debtor) Chapter 7

**APPLICATION TO CONTINUE HEARING ON
MOTION FOR RELIEF FROM AUTOMATIC STAY**

COMES NOW the Debtor, Toby Burkhart, by and through his attorney Jimmy L. Veith, P.C., and for his Application to Continue the Hearing on the Motion for Relief From Automatic Stay filed by Freedom Mortgage Corp. (doc. 7), would show to the Court:

1. There is currently scheduled a hearing on the above described Motion which is set for June 15th, 2016, at 9:00 o'clock a.m.
2. The Debtor has requested that Freedom Mortgage Corp. provide a statement showing how much the Debtor would have to pay to become current with his home mortgage. As of the date of this Motion, the reinstatement amount has not been provided.
3. The attorney for Freedom Mortgage Corp., Jim Timberlake, has informed Debtor's counsel that his client needs additional time to provide a reinstatement amount, and has no objection to this request for a continuance.
4. The Debtor has informed his attorney, that he could become current if he was provided a reinstatement quote.

WHEREFORE, the Debtor requests that the hearing on the above described motion be continued to the motion docket on July 13th, 2016, or for such time as the Court deems appropriate.

/s/ Jimmy L. Veith
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CERTIFICATE OF MAILING

I hereby certify that on the 14th day of June, true and correct copies of the above document were e-mailed to the persons/entities listed on the Notice of Electronic Mailing hereof.

/s/ Jimmy L. Veith

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